

CERTIFICATION

In the Electronics Recycling Industry

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***International Association
of Electronics Recyclers***

Web Site - <http://www.iaer.org>

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CERTIFICATION OBJECTIVES

- **Support & promote high standards for industry**
 - environmental quality
 - regulatory compliance
 - high quality business practices
- **Establish formal, objective certification process**
 - designation “Certified Electronics Recycler®”
- **Provide service to member companies**
 - help improve management systems
 - recognition of high quality electronics recyclers

PROGRAM DEVELOPMENT

- 1 Established basic criteria & process**
 - Team of IAER Leadership**
 - Existing Standards & industry practices**
 - Staff/professional support**
- 2 Developed details of certification/audit process**
 - Audit/Review Committee**
 - Service Provider participation**
- 3 Conducted pilot test of audit process**
- 4. Refined the process & sought buy-in**
- 5. Implemented certification program**

SERVICE PROVIDER

- **Selected group of potential candidate companies**
 - Member recommendations
 - Leaders in EHS & Quality auditing
- **Rigorous selection process**
 - consensus on key selection criteria
 - formal RFP & evaluation of proposals
 - interview of short list of candidates
- **Selected world-class accredited Registrar**
 - BVQI (WEB SITE - <http://www.BVQINA.com/>)

WHAT IS IAER CERTIFICATION?

- **INDUSTRY SPECIFIC REQUIREMENTS**
- **BROADER NEEDS OF CUSTOMERS**
- **KEY AREAS OF INTEREST TO STAKEHOLDERS**
- **PRACTICAL IMPLEMENTATION**
 - **for Small & Medium-size Enterprises (SMEs)**

IAER CERTIFICATION vs. ISO 9001 & 14001

- ISO Quality & Environmental Management Systems requirements generally more than adequate
- IAER Certification unique requirements
 - *incremental* to ISO in areas such as:
 - Health and Safety (management systems)
 - General Business (e.g., security, financial)
 - Operational Capabilities (e.g., equipment, facilities, personnel/skills, and controls)

BASIC CERTIFICATION PROCESS APPROACH

- **Focus on improving management systems**
 - not evaluating operational performance
- **Recognize existing certifications (e.g., ISO)**
- **Minimize audit burden to member companies**
- **Engage objective and qualified third party**
 - to provide certification services

BASIC CERTIFICATION PROCESS

GENERAL SCOPE

- **MANAGEMENT SYSTEMS**
 - Common Elements
 - (e.g., policy, planning, implementation, measurement, review)
 - Unique Elements
 - Environment, Health, Safety & Quality
- **GENERAL BUSINESS**
 - Management, Finances, Insurance, Security
- **OPERATIONAL CAPABILITIES & PROCESSES**
 - Operations, Personnel, Facilities, Equipment
 - Control Of Materials Of Concern
 - Downstream Due Diligence And Risk Management
 - Data Security

EXAMPLES FROM IAER STANDARD

- of some General Requirements

- **Management Systems**
 - “There shall be corporate commitments, in the form of **policies** and/or instructions that address the achievement and improvement of high standards of business practices in relation to each of the basic management systems.”
- **General Business**
 - “There shall be a plan and program for the **security** of the physical facilities, products and materials assets involved in the operational processes.”
- **Operational Capabilities & Processes**
 - “There shall be a process for the evaluation and monitoring of key **contracted operations** in relation to compliance with applicable regulations as well as the adequacy of their management systems.”

EXAMPLES FROM IAER STANDARD

- of some Specific Requirements

There shall be:

- “evidence of compliance with applicable environmental, health & safety **regulations**”
- “adequate **insurance** coverage for potential risks and liabilities associated with the nature and magnitude of the company’s operations”
- “evidence that a high percentage of the product received by the company is **recycled** and not land filled as well as a commitment to continuously improve in this area”
- “a process to control and document the **downstream** movement of electronic devices or their components until such point that they are reused, recycled, reclaimed or disposed in a manner that supports resource recovery and minimizes negative impacts on human health and the environment”

BASIC CERTIFICATION PROCESS

PROCESS STEPS

- 1. IAER Membership criteria**
- 2. Pre-screening process: questionnaire**
- 3. Audit Preparation: optional service**
- 4. Audit: on site review & assessment**
- 5. Follow-ups:**
 - Audit Report & Recommendations**
 - Corrective Action**
 - Certification**
 - Maintenance (renewal audits every 2 years)**

CERTIFICATION READINESS

IAER PRE-SCREENING QUESTIONNAIRE

- Evidence of prior experience with other relevant types of certifications.
- Evidence of relevant corporate policies and procedures.
- Knowledge of applicable legislative and regulatory requirements.
- In general, completing the questionnaire adequately.

FUNDAMENTAL QUESTIONS

- of Audit Process

- 1. Does the company have Management Systems that address key elements of environment, health, safety & quality?**
- 2. Does the company exhibit the basic characteristics of a reputable business?**
- 3. Does the company have operational capabilities that are consistent with what it claims to be the scope of its business?**
- 4. Does the company have adequate controls in place to protect its workers, customers and the environment?**

EXAMPLES OF KEY AUDIT FOCUS AREAS

- **MANAGEMENT PROCESSES & PROGRAMS**
 - Operational Capabilities and Processes
 - Environmental Compliance – Licenses and Permits
- **DOWNSTREAM DUE DILIGENCE**
 - Including export controls
- **HEALTH & SAFETY ASPECTS**
 - Including handling of “Materials of Concern”
- **SECURITY CONSIDERATIONS**
 - Including data as well as facilities

IAER CERTIFICATION DOCUMENTS

- Certification Standard
- Application for Certification
- Pre-Assessment Checklist
- Pre-Screening Questionnaire
- Audit Checklist
- Certification Guidance
- Certification Certificate

Program information – including Standard – is available on IAER web site at:

<http://www.iaer.org/communications/certification.htm>

CHALLENGES

- **Buy-in from stakeholder groups:**
 - OEMs
 - Government Agencies (federal, state, local)
 - NGOs
- **Market forces**
 - Customer expectations & requirements
- **Recognition – vs. ISO**
- **Time & effort to prepare**

PROGRAM STATUS & OUTLOOK

- **Certification process refined & updated**
 - ongoing process with IAER Committee
 - New cost-efficient process announced in 2006
 - Latest version (Release 2.1) announced 5/7/07
- **IAER participation in EPA-facilitated “BMPs”**
 - IAER Certification Standard consistent with key elements of BMPs
- **Increasing number of electronics recyclers seeking IAER Certification**
 - Over 20 facilities have achieved the designation of “Certified Electronics Recycler®”
 - More in the process of preparing or scheduling audits

EPA-FACILITATED PROCESS TO DEVELOP “BEST MANAGEMENT PRACTICES FOR ELECTRONICS RECYCLING” (BMPs)

- **Great deal of interest in the certification of electronics recyclers**
 - **General consensus that there needs to be a certification process for electronics recyclers**
- **2 year effort involving multiple stakeholder group**
- **Developed “General Principles” as well as specific requirements for use in certification programs**
- **Generated numerous iterations of a draft BMP document to try to converge on consensus**
- **Follow-up effort proposed on “Implementation”**

CERTIFICATION AUDITS - Perspective

WHAT YOU MUST HAVE:

- **Documentation**
 - Policies, procedures & assigned responsibilities
- **Awareness**
 - Legal & standards requirements
- **Communication**
 - Buy-in & training
- **Programs**
 - Goals, objectives, targets & measurements
- **Management**
 - Commitment, involvement, controls, tracking
- **Evidence** – to demonstrate all of the above

SUMMARY

- **Certification is market driven**
- **There are certifications for different needs**
- **Focus is on management processes**
- **Organization, discipline & control are key**
- **Preparation is critical**
- **Electronics recycling industry needs to promote best practices**

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